

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Annie B. Cross
Debtors

CHAPTER 13

American Heritage Federal Credit Union,
Movant,
v.

BANKRUPTCY CASE NUMBER
21-11974-elf

Annie B. Cross,
Respondent/Debtors,
and
William C. Miller, Trustee,
Additional Respondent.

**OBJECTION OF AMERICAN HERITAGE FEDERAL CREDIT UNION TO
CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN OF REORGANIZATION**

American Heritage Federal Credit Union, by and through its counsel, LOGS Legal Group LLP, hereby objects to the confirmation of Debtor's Chapter 13 Plan, and in support thereof, avers as follows:

1. On or about July 15, 2021, Debtors filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.
2. Movant holds an allowed claim, secured only by Debtor's principal residence located at 7615 Mountain Avenue, Elkins Park, PA 19027.
3. Movant is in the process of filing its Proof of Claim citing arrears in the amount of \$59,183.35.
4. Debtor's proposed plan calls for the payment to Movant of arrearages in the amount of \$56,800.00 to be paid to the Trustee through the Plan.
5. The Plan is insufficiently funded to pay Movant its proposed arrearage claim or proposed total debt claim in full.
6. The Plan fails to comply with 11 U.S.C. § 1322.
7. The Plan fails to comply with 11 U.S.C. § 1325.
8. The Court must deny confirmation of Debtor's Chapter 13 Plan.

WHEREFORE, American Heritage Federal Credit Union respectfully requests that confirmation of the Debtor's Plan be denied, that Debtor's bankruptcy petition be dismissed with prejudice; and for such other relief as this Court deems appropriate.

Respectfully submitted,

/s/ Kristen D. Little

Dated: August 26, 2021

BY: _____

Kristen D. Little, Esquire
LOGS Legal Group LLP
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CERTIFICATE OF SERVICE

I, Kristen D. Little, an employee of the law firm of LOGS Legal Group LLP hereby certify that I caused to be served true and correct copies of American Heritage Federal Credit Union's Objection to the Confirmation of Debtor's Chapter 13 Plan by First Class Mail, postage prepaid or by electronic notification, at the respective last known address or email address of each person set forth below on August 27, 2021:

David M. Offen
The Curtis Center
601 Walnut Street Suite 160 West
Philadelphia, PA 19106
Sent via electronic notification dmo160west@gmail.com

William C. Miller, Trustee
P.O. Box 1229
Phila, PA 19105
Sent via electronic notification ecfemails@ph13trustee.com

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

/s/ Kristen D. Little

Kristen D. Little
LOGS Legal Group LLP
3600 Horizon Drive, Suite 150
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(610) 278-6800

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